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22 *Sharp Electronics Manufacturing Company of America, Inc.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Case No. 07-cv-5944 (SC)

MDL No. 1917

This Document Relates to:

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF DIRECT
ACTION PLAINTIFFS' REPLY TO
THEIR MOTION TO ENFORCE
THE COURT'S ORDER RE:
THOMSON DISCOVERY BY
IMPOSING DEADLINE ON
THOMSON SA'S PRODUCTION OF
DOCUMENTS**

21 *Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,*
22 No. 13-cv-1173;

DATE: December 12, 2014

TIME: 10:00 a.m.

PLACE: Courtroom 1, 17th Floor

JUDGE: Hon. Samuel Conti

23 *Siegel v. Technicolor SA, et al.,* No. 13-cv-05261;
24 *Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*
25 No. 13-cv-05264;

26 *Target Corp. v. Technicolor SA, et al.,* No. 13-cv-
27 05686;

28 *Interbond Corporation of America v. Technicolor
SA, et al.,* No. 13-cv-05727;

1 *Office Depot, Inc. v. Technicolor SA, et al.*, No. 13-
2 cv-05726;

3 *Costco Wholesale Corporation v. Technicolor SA,*
4 *et al.*, No. 13-cv-05723;

5 *P.C. Richard & Son Long Island Corporation, et al.*
6 *v. Technicolor SA, et al.*, No. 13-cv-05725;

7 *Schultze Agency Services, LLC v. Technicolor SA,*
8 *Ltd., et al.*, No. 13-cv-05668;

9 *Sears, Roebuck and Co. and Kmart Corp. v.*
10 *Technicolor SA*, No. 3:13-cv-05262;

11 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.*, No.
12 13-cv-00157;

13 *Crago, et al. v. Mitsubishi Electric Corp.*, No. 14-cv-
14 02058.

15 I, CRAIG A. BENSON, hereby declare as follows:

16 1. I am a partner with the law firm of Paul, Weiss, Rifkind, Wharton &
17 Garrison LLP, counsel for Plaintiffs Sharp Electronics Corporation (“SEC”) and Sharp
18 Electronics Manufacturing Company of America, Inc. (“SEMA”). I am an active member in
19 good standing of the bars of the State of Maryland, the State of New York, and the District of
20 Columbia, and on March 20, 2013 was granted leave to appear *pro hac vice* in this litigation. I
21 have personal knowledge of the facts stated herein and could competently testify to these facts if
22 called upon to do so. I submit this Declaration in support of Direct Action Plaintiffs’ Reply
23 Memorandum in Support of their Motion to Enforce the Court’s Order re: Thomson Discovery
24 by Imposing Deadline on Thomson SA’s Production of Documents.

25 2. Attached hereto as Exhibit A is a true and correct copy of Direct Action
26 Plaintiffs’ First Set of Requests for Production to Thomson SA (April 14, 2014).

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed
2 this 17th day of November, 2014, at Washington, DC.

3 _____ /s/ *Craig A. Benson*

4 Craig A. Benson

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